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United States District Court  
Northern District of Illinois  
Eastern Division

FILED

APR 10 2008

Apr 10 2008

MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURTMR. Michael Young

Plaintiff,

vs.

Nurse Obie, et al.,

Defendant(s).

08-C-0302  
CASE NUMBER

Motion For Appointment of Counsel

Now come plaintiff, MR. Michael Young, Acting PRO-SE And coming through his legal Assistant Anthony O. Longstreet, SR., Moving this court for an order Appointing counsel in these Proceedings. And in Support of this Request, Plaintiff states the Following Below:

- 1) On January 10, 2008, Plaintiff Filed A 1983 Civil Rights complaint (Doc. No. 4) and Paid his Partial Filing Fee and WAS granted LEAVE to Proceed in FORMA PAUPERIS by District Judge Virginia Kendall.
- 2) The Plaintiff in this CASE is A psych-Patient on Psych medication and is disable And mentally unable to Proceed with this CASE without the Assistance of An Attorney.
- 3) This Civil Rights Action was initiated By Pre-trial detainee MR. Anthony O. Longstreet, SR., whom Plaintiff SAUGHT his Assistance to get Access to this court Pursuant to the United States Supreme Court Precedent Johnson v. Avery, 393 U.S. 483, 89 S. Ct. 747, 21 L. Ed. 2d 718 (1969).
- 4) This CAUSE of Action involves A complete denial of medical treatment, delay of Access to medical treatment and interfeRRANCE of medical treatment once it WAS prescribed OR suggested in violation of the United States Precedent Estelle v. Gamble, 429 U.S. 97, 97 S. Ct. 285, 50 L. Ed. 2d 51 (1976); Which resulted in long term Painful suffering.
- 5) This CASE involves A Fourth Amendment Constitutional violation to unREASONABLE denial And unREASONABLE delay and unREASONABLE interfeRRANCE with medical treatment in violation of Plaintiff Right to be secured in his Person when it come to him Receiving medical Attention.
- 6) Medical Experts would testify and Present medical Records that Plaintiff had sustained A Severe injury to his Right Knee. This included A Patellar tendon Rupture As well As ligamentous disruption which was complicated by Postoperative wound infections. The

Plaintiff was left with A knee that has extremely limited function at this stage. And Additional surgery is needed to improve stability. So Plaintiff is presently wearing a knee brace. But Jail officials has taken Plaintiff shoes and has refused to return the shoes even though they were told to do so through the grievance procedures. (control no. 2007X2550 and 2007X0636)

7) This has resulted in on-going pain without any medication for pain. And Plaintiff condition is chronic and Jail officials are aware. And since having this disability Plaintiff has been beat up and stumped by Jail officials on a medical wing (CASE NO. 08-C-0302) And they knew Plaintiff is a psychiatric patient and disable.

8) Due to being on psych-medication Plaintiff is unfit to represent himself and should be appointed counsel to assist him. Counsel will be able to issue subpoenas to the orthopedics in Wisconsin who is the doctor who performed the operation. This doctor is needed to explain the medical terms as to the procedures used to conduct the operation and what the other operation will achieve once performed. Plaintiff needs a knee replacement.

9) Plaintiff has attached various medical papers and grievance responses in support of this motion for appointment of counsel.

10) Plaintiff is aware that he does not have a constitutional right to counsel in a civil case and respectfully pray that this court appoint him counsel to help him with this litigation. Your consideration in this matter will be appreciated.

Respectfully Submitted

Michael Young #20070004908  
Plaintiff

JANUARY 20, 2008

MR. Michael Young # 20070004908  
Cook County Jail  
Division 10  
P.O. Box 089002  
Chicago, Illinois 60608

A K A Michael  
MARK Young

Certificate of Service

I, MR. Michael Young, do depose and state under OATH Pursuant to Chapter 735 ILCS 5/1-109 that I have Forwarded A copy of the Attached Motion For Appointment of Counsel with Attached Exhibits to the Following Below:

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By depositing A copy in the mail Box At Cook County Jail on April, 4, 2008.

Respectfully Submitted

Michael Young #20070004908  
Plaintiff

MR. Michael Young #20070004908  
Cook County Jail  
Division 16  
P.O. Box 989002  
Chicago, Illinois 60608

Thomas G. Morrissey, Ltd.

ATTORNEY AT LAW

10249 SOUTH WESTERN AVENUE

CHICAGO, ILLINOIS 60643

773-233-7900

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THOMAS G. MORRISSEY

Mr. Michael Young

#20070004908

Cook County Jail

Division Ten

P.O. Box 089002

Chicago, IL 60608

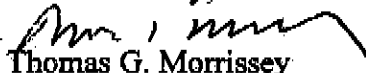
March 5, 2008

Dear Mr. Young:

I am responding to your request for legal representation in regards to your incarceration at the Cook County Jail. Due to other professional commitments, I will not be able to represent you in this matter.

If you decide to proceed with this matter, you should seek legal representation immediately. Under the Statute of Limitations, you have two years to file a lawsuit. I am not giving you an opinion whether you have a claim in this matter.

Sincerely,

  
Thomas G. Morrissey

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March 3, 2008

**Via First Class Mail**

Michael Young  
#20070004908  
Cook County Jail  
Division Ten  
P.O. Box 089002  
Chicago, Illinois 60608

**Re: Possible Case**

Dear Mr. Young:

I am in receipt of your recent correspondence dated February 5, 2008. I appreciate you forwarding these documents to me, but unfortunately taking on denial of medical care is a very expensive process in that we would need some expert to show you have been injured in this regard. Obtaining some medical testimony and proof could cost thousands of dollars. In addition thereto, there are some other concerns I have regarding the status of your case and due to my current litigation schedule I must respectfully decline getting involved in this matter. I strongly suggest if you wish to proceed you seek the advice of other legal counsel directly.

Respectfully yours,



Gregory E. Kulis

GEK/alm